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16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 NAVAJO HEALTH FOUNDATION – SAGE  
19 MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
20 Arizona non-profit corporation,

21 Plaintiff,

Case No. 2:19-cv-0329-GMN-EJY

22 vs.

23 RAZAGHI DEVELOPMENT COMPANY,  
24 LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
25 AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

**JOINT STIPULATION TO EXTEND  
PLAINTIFF’S TIME TO RESPOND TO  
DEFENDANTS’ MOTION TO STAY  
DISCOVERY AND FOR RULE 11  
SANCTIONS**

**(FIRST REQUEST)**

26 Defendants.  
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1 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of  
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit  
3 Plaintiff additional time, to and until April 1, 2022, to respond to Defendant’s motion to stay  
4 discovery (ECF No. 170) and for FRCP 11 sanctions (ECF No. 174). Presently, Plaintiff’s  
5 response to the motion to stay discovery is due today and the response to the FRCP 11 sanctions  
6 motion is due on March 24, 2022. This is Plaintiff’s first request for an extension of time for  
7 the reasons cited herein.

8 In support of this Stipulation, the parties agree to the following:

9       1. Good cause exists to support this request for additional time. The parties have  
10 discussed the pending motions and counsel for Plaintiff has notified counsel for Defendants that  
11 due to competing case commitments (including out of town travel for depositions in another  
12 case being handled by Paul S. Padda, Esq.), work obligations and an upcoming medical  
13 appointment (i.e. surgery) for Kathleen Bliss, Esq. additional time is needed to properly respond  
14 to the pending motions. This additional time will permit counsel for Plaintiff to complete  
15 responses to the pending motions, coordinate their review between Plaintiff’s counsel and then  
16 file them with the Court.

17       2. Counsel for the respective parties have communicated regarding this Stipulation and  
18 agree that an extension of time to and until April 1, 2022 is appropriate under the  
19 circumstances.

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1           The parties respectfully request the Court approve this Stipulation.

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3        /s/ *Kris Leonhardt*

4        Pavneet S. Uppal, Esq.  
5        Kris Leonhardt, Esq.  
6        Jeffrey D. Winchester, Esq  
6        *Counsel for all named Defendants*

7        Dated: March 21, 2022

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3        /s/ *Paul S. Padda*

4        Kathleen Bliss, Esq.  
5        Paul S. Padda, Esq.  
6        David Stander, Esq.  
6        Douglass A. Mitchell, Esq.  
6        *Counsel for Plaintiff,  
7        Counterdefendant and Third-Party  
8        Defendants*

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11           Dated: March 21, 2022

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13           **IT IS SO ORDERED:**

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15           **UNITED STATES MAGISTRATE JUDGE**

16           **DATED: March 22, 2022**

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